

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA )  
                                )  
                                )  
                                ) No. 1:19-CR-26-TSE  
v.                             )  
LUIS BONILLA-HERNANDEZ    )  
a/k/a SEBASTIAN,            )  
a/k/a EL COMMANDANTE,     )  
                                )  
Defendant.                 )

**GOVERNMENT'S POSITION ON SENTENCING**

The United States has reviewed the Probation Office's presentence report in this matter and agrees with its calculation that the total offense level is 17, providing a sentencing guideline range of 24-30 months incarceration. Pursuant to the factors set forth in 18 U.S.C. § 3553(a), the United States seeks a guideline sentence of 24-30 months incarceration and 3 years of supervised release.

**A. NATURE AND CIRCUMSTANCES OF THE OFFENSE**

Defendant, along with Eliazar Duran Mota, operated a prostitution business out of their residences located in Sterling and Herndon Virginia over the course of three years from August 2015 through July 2018. The women prostituted were Hispanic, spoke little-to-no English, and found themselves struggling financially in the United States. Defendant and Duran Mota would house one woman for a week at a time in their residences for purposes of prostitution. The females engaged in numerous prostitution dates each day from Monday through Saturday. On Sunday, Defendant and Duran Mota "switched out their inventory" by obtaining a new woman to stay at their residences for purposes of prostitution.

The prostitution business run by Defendant and Duran Mota catered largely to male Hispanic sex customers. The prostituted women were referred to as "Treinteras," a term derived

from the Spanish word for thirty (treinta). Defendant set the rates for the prostitution dates, requiring the customers to pay between \$30-\$40 per 15-minute prostitution encounter.

Defendant and Duran Mota advertised the women through word of mouth and business cards that appeared, on their face, to advertise car services. While handing out the cards, the potential customers were verbally told what services were actually being provided. The customers would then call Defendant or Duran Mota and the commercial sex dates would be set up.

Defendant and Duran Mota drove the women to numerous residences and commercial establishments for the prostitution encounters. The women engaged in 10-20 prostitution dates per day. After each prostitution date, the women were required to provide all the money to the driver, which alternated between Defendant and Duran Mota. After working in prostitution from Monday through Saturday, the women then received 50% or less of their earnings from Defendant or Duran Mota.

During interviews with the women prostituted, they described their bodies being sore and exhausted from the number of prostitution dates they had per day. They further described various forms of verbal abuse they endured while with various commercial sex customers and threats to their physical safety. They discussed continuing to work out of fear that they would not get their portion of the money at the end of the week on Saturday.

At the conclusion of the week, Defendant and Duran Mota would transport the prostituted female to their next location and then pick up a new female at Union Station in Washington, D.C. to start a new week in the prostitution business.

Law enforcement learned of the prostitution business being operated by Defendant through a source. After learning such information, law enforcement set up surveillance on

Defendant's residence and began collecting evidence through various means. Law enforcement believes more than ten women were prostituted through Defendant's business.

On July 6, 2018, a residential search warrant was executed on Defendant's residence in Sterling, Virginia. During the execution of the search warrant, law enforcement located prostituted female J.P.A. at the residence. Law enforcement also located business cards used to promote prostitution, condoms, lubricant, and approximately \$14,035 in cash in the residence. A search warrant was also conducted on Duran Mota's residence in Herndon. Through interviews with Duran Mota, law enforcement learned that Defendant recruited Duran Mota into his prostitution business and was initially hired as a driver. Duran Mota further informed law enforcement some of the prostituted women had pimps they had to answer to, separate and apart from Defendant and Duran Mota.

## **B. HISTORY AND CHARACTERISTICS OF THE DEFENDANT**

Defendant was born in El Salvador and has a close relationship with his mother, who still resides in El Salvador. Defendant illegally entered the United States around the age of 15 years old. Defendant enrolled at Herndon High School but withdrew after completing the tenth grade. While in the United States, Defendant worked for a construction company in Sterling, Virginia and at an autobody repair business. He also worked as a HVAC technician. Despite these lawful jobs, Defendant chose to operate a prostitution business for at least three years and profited off of the sexual exploitation of numerous females' bodies.

## **C. SERIOUSNESS OF THE OFFENSE, PROMOTION OF RESPECT FOR THE LAW, THE NEED TO DETER FUTURE CRIMES AND PROTECT THE PUBLIC, AND THE PROVISION OF JUST PUNISHMENT**

Running a prostitution business is a serious offense that inflicts mental, emotional, and physical harm on the women prostituted. Defendant profited from the sexual exploitation of women who found themselves in a difficult and vulnerable places. Contrary to some beliefs,

prostitution is not a “victimless crime” and the tears, pain, and shame expressed by the females in this case during interviews with the United States underscores that principle. There is a strong need to deter Defendant and other individuals similarly situated from committing more and similar offenses in the future. As for a provision of just punishment, the United States believes a guideline sentence of 24-30 months incarceration is appropriate, along with three years of supervised release.

Respectfully submitted,

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

/s/Maureen C. Cain  
By: Maureen C. Cain  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification to counsel of record.

*/s/Maureen C. Cain*  
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